

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

SIGMA RELOCATION GROUP, LLC :
D/B/A UMOVEFREE.COM, :

Opposer, :

v. :

MOVEFORFREE.COM, INC., :

Applicant. :

78/589267
Opposition No. 91/170,390

ANSWER TO NOTICE OF OPPOSITION

Applicant, MOVEFORFREE.COM, INC., ("Applicant"), by the undersigned counsel, answers the Notice of Opposition as follows (the paragraphs of the Answer are numbered to correspond to those of the Notice of Opposition):

1. Applicant denies that Opposer has acquired lawful trademark rights in the mark, UMOVEFREE.COM.
Applicant lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of this paragraph, and therefore denies the same.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore denies the same.



3. This paragraph is a characterization of Applicant's registration on the Supplemental Register for the mark, MOVEFORFREE.COM, and the registration speaks for itself as to the information contained therein. Based on this characterization, this paragraph requires no further response.
4. This paragraph is a characterization of a cancellation proceeding which has recently been consolidated with this opposition. Therefore, this paragraph requires no further response.
5. This paragraph is a characterization of Applicant's application to register the mark, MOVEFORFREE.COM, on the Principal Register, and the application speaks for itself as to the information contained therein. Based on this characterization, this paragraph requires no further response.
6. Applicant denies the allegations contained in this paragraph.
7. Applicant admits that the registration of Applicant's mark would grant Applicant prima facie exclusive right to the use of Applicant's mark. Applicant further admits that Opposer is required to abandon Opposer's mark and change its promotional and advertising

methods. Applicant denies the remaining allegations set forth in this paragraph.

FIRST AFFIRMATIVE DEFENSE

The Notice of Opposition fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Opposer comes to the Board with unclean hands and is not entitled to any relief.

WHEREFORE, Applicant pray that judgment be entered for Applicant and against Opposer, that this Notice of Opposition be dismissed with prejudice, and for such other and further relief as the Board deems adjust and proper.

Respectfully submitted,

MOVEFORFREE.COM, INC.

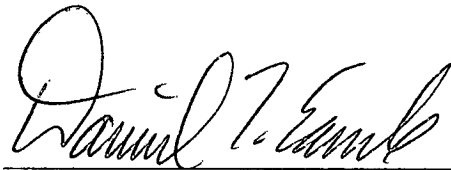
Date: June 26, 2006

By: 

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Daniel T. Earle
Attorneys for Applicant
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CERTIFICATE OF SERVICE

It is hereby certified that this ANSWER TO NOTICE OF OPPOSITION has been served upon Opposer by mailing a copy thereof by prepaid first class mail to Scott L. Harper, Counsel for Opposer, Carstens & Cahoon, LLP, 13760 Noel Road, Suite 900, Dallas, Texas 75240, this 26th day of June, 2006.

A handwritten signature in cursive script, appearing to read "Daniel T. Earle", is written over a horizontal line.

Daniel T. Earle